

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

(Alexandria Division)

ROBERTO CLAROS et al.,

*Plaintiffs,*

v.

SWEET HOME IMPROVEMENTS, INC., et al.,

*Defendants*

Case No: 1:16-cv-344-AJT-MSN

**CORPORATE DEPOSITION: AMENDED NOTICE**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, on the 16th day of August, 2016, beginning at 10:00 a.m. at the offices of Plaintiffs' counsel: Legal Aid Justice Center, 6066 Leesburg Pike, Suite 520 Falls Church, VA 22041, to be recorded by stenographic means, Plaintiffs' counsel will take the deposition of the designated representatives of Sweet Home Improvements, Inc. ("Sweet Home") with knowledge of the following:

1. Sweet Home's corporate structure and ownership.
2. The job duties and responsibilities of each of Sweet Home's principals.
3. All circumstances surrounding Sweet Home's hiring of each of the Plaintiffs.
4. Sweet Home's practices and procedures for entering into a home construction or renovation project with a property owner.
5. Sweet Home's recordkeeping practices with regard to payroll and employment records;
6. The means by which Sweet Home determined:



- a. Each Plaintiff's wage rate;
  - b. How many hours each Plaintiff worked each day;
  - c. How much pay each Plaintiff would receive in a given week;
  - d. The method that would be used to pay Plaintiffs' wages;
  - e. Any deductions that would be made from a Plaintiffs' pay; and
  - f. Whether to pay a Plaintiff an overtime premium for any hours he worked beyond 40 in a given workweek.
7. The circumstances under which the approximately three cell phones were broken, upgraded, or replaced, as stated in your answer to Roberto Claros's Interrogatory No. 8;
  8. The circumstances under which the cancelled checks / carbon copies of Plaintiffs' paychecks were lost or destroyed, as stated in your answer to Roberto Claros's Interrogatory No. 8;
  9. The nature of Sweet Home's authority to supervise or inspect Plaintiffs' work;
  10. Acts of misconduct or inadequate performance by any Plaintiff;
  11. The nature of Sweet Home's authority to discipline or terminate Plaintiffs;
  12. Communications with third parties regarding Plaintiffs' work, including their hours, compensation; termination or separation from work; this lawsuit; or Sweet Home's pay practices in general;
  13. Communications with each of the Plaintiffs regarding their work or compensation;
  14. The means or processes by which Plaintiffs were to get supplies they needed for work;
  15. The steps that Sweet Home took to respond to Plaintiffs' written discovery requests;
  16. Authentication of documents produced by Defendants in discovery; and
  17. The case of *Campos Rios v. Sweet Home Improvements, Inc.*, 1:15-cv-1532-CMH-JFA (E.D. Va.)

Respectfully submitted,



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*Attorney for Plaintiffs*

July 21, 2016

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**Certificate of Service**

I hereby certify that on July 21, 2016, I sent the foregoing Corporate Deposition Notice to Defendants' counsel by U.S. mail and email at the following address:

Jason Jin Huh  
Law Office of Jason J. Huh, PLLC  
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*Counsel for Defendants*

//s// Nicholas Cooper Marritz  
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July 21, 2016